

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ALLSTATE INSURANCE COMPANY,  
ALLSTATE INDEMNITY COMPANY,  
ALLSTATE PROPERTY & CASUALTY INSURANCE  
COMPANY,  
ALLSTATE FIRE & CASUALTY INSURANCE COMPANY,  
AND  
ALLSTATE VEHICLE & PROPERTY INSURANCE  
COMPANY,

Plaintiffs,

vs.

CHARLES J. DEMARCO, M.D.,  
DELTA DIAGNOSTIC RADIOLOGY, P.C.,  
AVALON RADIOLOGY, P.C.,  
EDWARD GORSHTEN,  
LEONID SHUSTERMAN,  
AKKORD MANAGING SERVICES, INC., AND  
BIG APPLE MANAGING SERVICES. INC.,

Defendants.

C.A. No.

**CERTIFICATE OF NO LIABILITY INSURANCE**

I, Richard D. King, counsel for the plaintiffs in the above-captioned matter, hereby certify  
that:

- (1) The plaintiffs are not aware of any liability insurance available to satisfy the  
judgment sought in this matter.
- (2) Neither I nor the plaintiffs have any reason to believe that there will be any  
liability insurance available to satisfy the judgment sought in this matter as  
the Complaint alleges intentional acts of racketeering and insurance fraud  
against the above-identified defendant.

[SIGNATURE PAGE FOLLOWS]

SMITH & BRINK, P.C.

*/s/ Richard D. King, Jr.*

---

Richard D. King, Jr. (RK8381)  
rking@smithbrink.com  
Nathan A. Tilden (NT0571)  
ntilden@smithbtink.com  
Michael W. Whitcher (MW7455)  
mwhitcher@smithbrink.com  
Shauna L. Sullivan (SS5624)  
ssullivan@smithbrink.com  
Jasmine G. Vieux (JG1805)  
jvieux@smithbrink.com  
1325 Franklin Ave., Suite 320  
Garden City, NY 11530  
(347) 710-0050 (phone)

Attorneys for the Plaintiffs,  
*Allstate Insurance Company,*  
*Allstate Indemnity Company,*  
*Allstate Property & Casualty Insurance Company,*  
*Allstate Fire & Casualty Insurance Company, and Allstate*  
*Vehicle & Property Insurance Company*

Dated: August 5, 2015